

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

REDBRICK VENTURES LTD. and  
PRIMESHIPPING INTERNATIONAL

Plaintiffs,

vs.

CAC MARITIME LTD. and  
STIEGLER SHIPPING COMPANY INC.

Defendants

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Case No. 2:21-cv-249-WSS

**IN ADMIRALTY**

**MOTION FOR AN ORDER APPOINTING A SPECIAL PROCESS SERVER PURSUANT  
TO RULE 4(C)(3) AND SUPPLEMENTAL RULE B**

COMES NOW, Plaintiffs REDBRICK VENTURES and PRIMESHIPPING INTERNATIONAL (hereinafter collectively referred to as “Plaintiffs”), by and through undersigned counsel, and respectfully moves this Honorable Court for an Order Appointing a Special Process Server Pursuant to Rule 4(c)(3) of the Federal Rules of Civil Procedure and Rule B of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Plaintiff desires that a Process of Maritime Attachment and Garnishment be served on PNC Bank Corp. (hereinafter “Garnishee”) with all deliberate speed so that it will be fully protected against the possibility of the USD \$655,727.18, held by PNC Bank Corp. (the “Subject Funds”) being removed from the account. A member of this firm, a third-party process service, all of whom are over 18 years of age and not party to this action, will act as special process server to effect service of the Process of Maritime Attachment and Garnishment on Garnishee at any branch within the District where service will be accepted.<sup>1</sup>

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<sup>1</sup> Due to the ongoing coronavirus pandemic, business operations at PNC Bank Corp. branches within the District may be temporarily closed, operating with limited hours, or have limited access to the public.

Further, in light of the COVID-19 pandemic, Plaintiff respectfully requests permission to serve the Ex Parte Order of Maritime Attachment and Garnishment and Writ of Maritime Attachment and Garnishment by electronic means such as facsimile or e-mail.

To the extent that the Application for an Order Appointing a Special Process Server with respect to this writ of attachment and garnishment does not involve a restraint of physical property, there is no need to require that the service be effected by a U.S. Marshal as it simply involves the delivery of the writ to the garnishee(s) who are believed to be in possession of the Subject Funds. To avoid the need to repeatedly serve the garnishee, Plaintiffs respectfully seek leave, as embodied in the accompanying proposed order, for any writ served on a garnishee to be deemed effective and continuous throughout any given day.

WHEREFORE, Plaintiffs respectfully requests this Honorable Court grant the instant motion and appoint a special process server, who is over the age of 18 and not party to this action, and such other and further relief as the Court may deem appropriate in the circumstances.

Dated: Pittsburgh, PA  
February 23, 2021

THOMSON, RHODES & COWIE, P.C.

By: /s/ David M. McQuiston, Esq.  
David M. McQuiston  
Two Chatham Center, 10<sup>th</sup> Floor  
Pittsburgh, PA 15219-3499  
(412) 316-8661  
(412) 232-3498  
[dmcquiston@trc-law.com](mailto:dmcquiston@trc-law.com)

*Attorneys for Plaintiffs REDBRICK  
VENTURES LTD. AND PRIMESHIPPING  
INTERNATIONAL*